

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection**

B159753817

FACILITY: Ace-Saginaw Paving Co. Plant 3		SRN / ID: B1597
LOCATION: 4190 JIMBO DR, BURTON		DISTRICT: Lansing
CITY: BURTON		COUNTY: GENESEE
CONTACT: Alicia Ramsdell , Environmental Engineer		ACTIVITY DATE: 06/08/2020
STAFF: Daniel McGeen	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled inspection, and subsequent review of recordkeeping, done as partial compliance evaluation (PCE) activities, part of a Full Compliance Evaluation (FCE) activity.		
RESOLVED COMPLAINTS:		

On 6/8/2020, the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted a scheduled inspection of Ace-Saginaw Paving Company Plant 3, in Burton, and subsequently conducted a review of recordkeeping and facility logs. These were Partial Compliance Evaluation (PCE) activities, done as part of a Full Compliance Evaluation (FCE).

Environmental contact::

Alicia Ramsdell, Environmental Engineer; 313-402-5823; aramsdell@edwclevy.net

Facility description:

This Hot Mix Asphalt (HMA) plant was installed during early 2017, replacing an existing dual drum HMA plant.

Emission units:

Emission Unit ID	Emission Unit Description	Permit to Install (PTI) No.	Federal regulation	Compliance status
EUHMAPLANT	Hot Mix Asphalt (HMA) facility including: aggregate conveyors, 500 ton per hour counterflow drum, knockout box, fabric filter dust collectors	128-73F	40 CFR Part 60, Subpart I	Compliance
EUYARD	Fugitive dust sources including: Plant roadways, plant yard, material storage piles, material handling operations (excluding cold feed aggregate bins)	128-73F	40 CFR Part 60, Subpart I	Compliance
EUACTANKS	Liquid asphalt cement (AC) storage tanks	128-73F	40 CFR Part 60, Subpart I	Compliance
EUSILOS	HMA paving material product storage silos	128-73F	40 CFR Part 60, Subpart I	Compliance

Regulatory overview:

On 1/22/2016, the company received Permit to Install (PTI) No. 128-73F, to install a new HMA plant, equipped with a counterflow drum dryer, knockout box, baghouse, virgin and RAP aggregate handling and feed systems, liquid AC storage tanks with condensers, covered drag slat conveyor, HMA product storage siloes, top of silo control, truck loadout enclosure, and blue smoke control system. This PTI is an opt-out permit, because it limits the facility's Potential to Emit (PTE) to below 100 TPY of each criteria pollutant, to keep it from becoming a major source, opting out of the Title V program..

A major source has the Potential to Emit of 100 TPY of one or more of the criteria pollutants: carbon monoxide (CO), Nitrogen Oxides (NOx), Sulfur Dioxide (SO2), Volatile Organic Compounds (VOC), particulate matter (PM), particulate matter smaller than 10 microns (PM-10), particulate matter smaller than 2.5 microns (PM2.5), and lead. The company chose to limit potential emissions by restricting the annual production allowed by their PTI, while burning specified fuels. The current PTE for this facility is listed in the table below:

Criteria pollutant	Allowable TPY
CO	80.5
NOx	37.1
S02	16.5
VOC	15.3
PM	4.1
PM-10	5.8
PM2.5	1.4

Lead does not have the PTE to reach major source levels for this facility.

Fee status:

This facility is classified as a Category D fee source, because it is subject to a federal New Source Performance Standard (NSPS), 40 CFR Part 60, Subpart I, *Standards of Performance for Hot Mix Asphalt Facilities*. The facility is required to report air emissions to AQD annually, through the Michigan Air Emissions Reporting System (MAERS).

Location:

The facility is located in an industrial park. However, there may be one residential property, combined with a business, about 1,000 feet to the east of the HMA plant. Otherwise, the nearest residences are about 1,600 feet to the south southeast of the plant.

Recent history:

In early 2016, the current plant was installed brand new, replacing a dual drum plant which had operated there for decades.

Stack testing:

Stack testing for CO, NSPS particulate matter, and opacity was done on 7/20-21/2016, while burning natural gas and RUO. The facility was in compliance with permitted limits. The CO results, which averaged 0.13 lb/ton while firing RUO, complied with the permitted limit for CO while firing RUO of 0.201 lb/ton. The particulate results were 0.006 grains/dscf, and 0.004 lb/ton, below the NSPS limit of 0.04 grains/dscf, and below the permitted limit of 0.03 lb/ton, respectively. Opacity readings were all 0%, complying with the limit in the NSPS of 20% and with the 20% except for one 6-minute average per hour not to exceed 27% opacity limit of Michigan Air Pollution Control Rule 301.

Safety equipment:

Safety glasses with side shields,, steel toed boots, a hard hat, and a high visibility safety vest are required. It is not known to me if hearing protection is required, but I would recommend AQD staff bring it, as a standard safety measure.

Note: During the current COVID-19 pandemic, AQD requires field staff to wear an appropriately designed mask, and to pre-arrange the inspection with the facility, so that an appropriate plan can be made to allow staff to access the site while following site-specific safety measures. I therefore contacted the company to pre-arrange the inspection.

Odor evaluation:

At 10:19 AM, I checked for odors downwind, on Dort Highway, prior to arrival. No odors could be detected. Weather conditions were partly sunny, 73 degrees F, with winds 0-5 miles per hour out of the east southeast

The AQD 0 to 5 odor scale is as follows:

- 0 - Non-Detect
- 1 - Just barely detectable
- 2 - Distinct and definite odor
- 3 - Distinct and definite objectionable odor
- 4 - Odor strong enough to cause a person to attempt to avoid it completely
- 5 - Odor so strong as to be overpowering and intolerable for any length of time

Arrival:

As mentioned earlier, EGLE guidance to field staff conducting inspections during the COVID-19 pandemic was currently to prearrange inspections with facilities, to establish a plan to inspect the facility while respecting health and safety protocols of EGLE and the facility. This was therefore a pre-arranged inspection.

I arrived at 10:22 AM, and the plant appeared to be running. I drove on the truck entrance route through the site, which is one way. It is my understanding that this is the path all visiting vehicles should take through the site. Paved roads looked to be clean, and unpaved roadways looked to have recently been treated with the dust suppressant calcium chloride.

I parked adjacent to the control tower. I met with Ms. Alicia Ramsdell, Environmental Engineer from Edward C. Levy Company, which is the parent company for Ace-Saginaw Paving Company. I was told that their operator for the plant today was Wes.

Ms. Ramsdell had explained in advance of today's date that because the control room for the HMA plant is a small, enclosed area, Edward C. Levy does not permit visitors to enter the control room, during the COVID-19 pandemic. However, we discussed and agreed that a daily summary of plant operating data would be an effective substitute for me not being able to access the control tower. I indicated that I would send Ms. Ramsdell an email following the inspection, with a list of the required records that I would like copies of.

Inspection:

The plant was running, while I was onsite. As discussed above, the small, enclosed control room is off limits to visitors, during the COVID-19 pandemic. This is to minimize the risk of spreading the coronavirus. Ms. Ramsdell and I agreed that I could email her with a request for plant operating data, as part of my overall records request for this inspection.

Because of the pandemic, production this season has been somewhat less than normal, I was told. It is my understanding that this season got off to a later start, with delayed residential construction/development.

I checked for visible emissions from the baghouse exhaust stack periodically during the inspection, but there were none, other than steam. Weather conditions were mostly sunny and moderately humid, with winds 0 to 5 miles per hour, out of the northeast.

A knockout box is used as a gravity collector, to remove coarse particulates from the exhaust stream, prior to the baghouse. It is my understanding that the baghouse has 1,300 bags, of a style called "two pocket" bags, and the draft through the drum dryer is 1,700 cfm. It is my understanding that a reverse air cleaning mechanism is used to clean the bag, to remove collected dust, and that the collected dust is reinjected as fines back into the product mix, in the drum dryer.

Visible emissions check

Potential emission source	Visible emissions?
Drum dryer	No
Burner end of drum	No
Virgin aggregate conveyor	No

Virgin aggregate screen	No
RAP conveyor	No
RAP collar	No
Ductwork	No
Knock out box	No
Baghouse	No
Baghouse exhaust stack	No
Dust reinjection system	No
Liquid AC tanks	No
RUO tank	No
"Tack" tank	No
Drag slat conveyor (enclosed)	No
Storage silos	No
Truck loadout	No
Blue smoke control system exhaust stack	No

Most of the roadways at the site are paved. They looked clean, and Ms. Ramsdell explained that they had been swept on Saturday, 6/6. Around the aggregate storage piles are unpaved roadways. These appeared to have been very recently treated with calcium chloride. A front end loader was not generating any fugitive dust from its tires, or from its delivering sand to a virgin aggregate feed bin.

A compliance check with the Special Conditions of PTI No. 128-73F follows.

Special Conditions for EUHMAPLANT:

I. EMISSION LIMITS

Emission limits are specified in a table for PM, PM10, CO, SO₂, NO_x, lead, formaldehyde, 2-Methyl-1-Pentene, and hydrogen chloride. The facility underwent stack testing on 7/20 and 7/21/2016, for CO, particulates, and opacity, while burning Recycled Used Oil and natural gas. The results were well within permitted limits for CO, particulates, and opacity.

II. MATERIAL LIMITS

1. The facility is prohibited from burning any fuel other than natural gas, liquid petroleum gas, ultra low sulfur diesel, or recycled used oil (RUO) in EUHMAPLANT. The facility was burning natural gas, at this time, but RUO was onsite and was available for use as fuel, I was informed.
2. The permittee is prohibited from burning in EUHMAPLANT any hazardous waste, blended fuel oil or RUO containing any contaminant that exceeds the following concentrations or for which the flash point, or ash content, vary from the standards in the following table.

Contaminant	Limit	Units
Arsenic	5.0	ppmw
Cadmium	2.0	ppmw
Chromium	10.0	ppmw
Lead	100.0	ppmw
PCBs	1.0	ppmw
Total Halogens	4000.0	ppmw
Sulfur	1.5	Weight %
Minimum Flash Point	100.0	Deg. F
Maximum Ash Content	1.0	Weight %

The plant was burning natural gas today, but is permitted to also burn RUO. In 2017, RUO samples were taken when RUO was onsite, and the results complied with the permitted limits. Although RUO was being stored in the RUO storage tank onsite, today, I was informed that it had not been burned as fuel at all this year, nor had any deliveries been made to the site in 2020.

3. The permittee is prohibited from using any asbestos tailings or waste materials containing asbestos. It is my understanding that they do not use any asbestos tailings or any waste materials containing asbestos.

4. The RAP content of the asphalt mixture is limited to a maximum of 50% RAP, based on a monthly average. The 6-28-2020 Daily Operator Log which was sent to me electronically upon my request in September 2020 showed that the RAP content today was 27.23%, below the 50% limit. It is my understanding that Ace-Saginaw does not use any shingle material in their paving mixtures.

5. Production is limited to no more than 800,000 tons of HMA in EUHMAPLANT per 12-month rolling time period, as determined at the end of each calendar month. In September, 2020, I requested records of facility production. Total HMA production so far in 2020, from the start of the paving season through 9/28/2020, was 207,327.80, well below the permitted limit. Total production for all of 2019 was 291,536.00 tons, as reported to MAERS, also well below the permitted limit.

6. While combusting diesel fuel (ultra low sulfur diesel fuel) or RUO, the facility is limited to no more than 550,000 tons of HMA production per 12-month rolling time period, as determined at the end of each calendar month. 2019 production while burning RUO as fuel was 148.00 tons, as reported to MAERS. 2020 production while burning RUO was 0.00 tons, as no RUO was burned in 2020.

7. The plant is prohibited from a production rate of more than 500 tons per hour (TPH) of HMA, based on a daily average, to be determined by dividing the daily HMA production by the daily operating hours. The 6-28-2020 Daily Operator Log which was sent to me electronically upon my request in September 2020 showed that production rate today was 274.22 TPH, below the permitted maximum.

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The facility is required to implement and maintain the Fugitive Dust Control Plan for EUYARD, specified in Appendix A of the PTI. It appeared that the facility was following their fugitive dust plan appropriately.

2. The permittee is required to implement and maintain the Preventative Maintenance Program specified in Appendix B of the PTI. It is my understanding that they are implementing and maintaining this. Attached to this inspection activity report is an example of the baghouse inspection log.

3. The permittee is required within 60 days of permit issuance to submit an emission abatement plan for startup, shutdown, and malfunctions of equipment contained in EUHMAPLANT. The company submitted an emission abatement plan on 8/23/2016.

4. The permittee is required to implement and maintain the Compliance Monitoring Plan (CMP) for RUO specified in Appendix C of the PTI, or an alternate approved plan. It is my understanding that they follow this.

5. The permittee is required to maintain the efficiency of the EUHMAPLANT drum mix burner(s), to control CO emissions, by fine tuning the burners. This is to be done at the start of the paving season, or upon a malfunction of EUHMAPLANT as shown by the CO emission monitoring data. It is my understanding that CO readings are taken with a handheld CO monitor, after the baghouse. Please see below.

Ms. Ramsdell explained that they had fine-tuned the burner just last week. They fine-tune it once every month, to be proactive, she indicated, above and beyond the minimum requirement.

On 9/15/2020, I emailed a request for recent CO monitoring data. I was sent an example of data which was collected on 9/11/2020, as shown in the table below. The facility is meeting this permit requirement.

CO reading #	Co reading, in ppm
1	278

2	278
3	283
4	288
5	267
6	266
7	273
8	271

TPH: 270

Mix code: 1850

IV. DESIGN/EQUIPMENT PARAMETERS

1. The fabric filter dust collector, or baghouse, is required to be installed, maintained, and operated in a satisfactory manner. Satisfactory operation is said to require a pressure drop range between 2 and 10 inches of water column (w.c.), and the minimum pressure drop is prohibited from being less than 2 inches w.c., except when a large number of bags have been replaced or other reason acceptable to AQD.

The attached A3 Burton 4-30-2020 Logs.pdf details maintenance performed on the baghouse, including the annual black light testing performed at the start of the paving season. Following the testing, 8 bags were documented as replaced, due to holes.

During the inspection, there were no visible emissions (other than steam) from the baghouse exhaust stack. We were not able to enter the control room during the inspection, as part of the site's COVID safety precautions. However, the recordkeeping I received by email showed that the baghouse pressure drop as recorded by the operator during the day was 3 inches, water column. The baghouse appeared to be operating properly, at this time.

V. TESTING/SAMPLING

1. This condition states that verification of odor rates from this plant may be required, upon notification from the AQD District Supervisor. Neither this HMA plant nor its predecessor at this site have ever been the subject of an odor complaint to the AQD, and therefore testing for odor rates is not being required at this time.

2. EUHMAPLANT is required to undergo stack testing for CO emission rates within 60 days after achieving maximum production rate of HMA, but not later than 180 days after commencing trial operation. Stack testing for CO took place from 7/20 to 7/21/2016. The CO results, which averaged 0.13 lb/ton while firing RUO, complied with the permitted limit for CO while firing RUO of 0.201 lb/ton.

3. EUHMAPLANT is required to undergo stack testing for particulate emission rates within 60 days after achieving maximum production rate of HMA, but not later than 180 days after commencing trial operation, pursuant to 40 CFR Part 60, Subpart I, *Standards of Performance for Hot Mix Asphalt Facilities*. Stack testing for NSPS particulate rates took place from 7/20 to 7/21/2016. The particulate results were 0.006 grains/dscf, and 0.004 lb/ton, below the NSPS limit of 0.04 grains/dscf, and below the permitted limit of 0.03 lb/ton, respectively.

The company is required to notify the AQD District Supervisor in writing, within 15 days of the date of commencement of trial operations. On 5/23/2016, AQD received a 5/19/2016 letter from Mr. Benjamin J. Kroeger, Environmental Engineer for Edward C. Levy Co., advising AQD that construction of the HMA plant was completed on 5/3/2016. No later than 45 days prior to testing, a complete test plan, including a testing schedule, is required to be submitted to AQD. On 5/23/2016, AQD's Technical Programs Unit (TPU) received a 5/19 stack test protocol from Derenzo Environmental Services (DES), so this condition was met.

VI. MONITORING/RECORDKEEPING

1. All required calculations are required to be completed in a format acceptable to the AQD District Supervisor by the 30th day of the calendar month, for the previous calendar month. On 9/15/2020, I requested an example of a monthly production log, and received the monthly log for June, *Ace A3 Burton 6-2020 Monthly Production and Emissions Log.pdf*, which corresponds to the 6/8/2020 date of the inspection. Since I did not request an August 2020 production log, I was not able to verify that all calculations were done by the 30th day of the calendar month, for the previous calendar month. AQD does not have any reason to suspect noncompliance, however, so the timeliness of calculations can wait to be confirmed until a future inspection.

2. Virgin aggregate feed rate and RAP feed rate is required to be monitored on a continuous basis. This is documented in the attached *Ace A3 Burton Consolidated Production Summary through 9-28-2020.pdf*. The company documented the amount of RAP aggregates used YTD. The amount of virgin aggregate mixes and RAP is tracked daily in the operators logs. Please see attached *Ace A3 Burton - 6-8-2020 Daily Operator Log.pdf*, and the attached *Ace A3 Burton - 9-11-2020 Daily Operator Log.pdf*. The facility is meeting this requirement.

3. The permittee is required to monitor, with a hand held CO monitor, CO emissions from EUHMAPLANT and associated production data from the time of the emissions readings upon startup of each paving season, upon a malfunction of the drum dryer or its associated burner, and once per calendar month in which EUHMAPLANT operates.

On 9/15/2020, I emailed a request for recent CO monitoring data. I was sent an example of data which was collected on 9/11/2020, as shown in the table below. The facility is meeting this permit requirement. :

CO reading #	Co reading, in ppm
1	278
2	278
3	283
4	288
5	267
6	266
7	273
8	271

TPH: 270

Mix code: 1850

4. The permittee is required to monitor emissions and operating information in accordance with 40 CFR Part 60 Subparts A and I. The stack testing of 7/20-21/2016 was within 180 days of commencing operation.

5. The permittee is required to conduct all necessary maintenance and make all necessary attempts to keep all drum mixer/burner and fabric filter dust collector components of EUHMAPLANT maintained and operating in a satisfactory manner at all times. They are required to maintain a log of all significant maintenance activities conducted and all significant repairs made to EUHMAPLANT. Maintenance for the baghouse or fabric filter dust collector is required to be consistent with the Preventative Maintenance Program specified in Appendix B of the PTI. Attached to this inspection activity report is a copy of the baghouse inspection log.

During the inspection, the components of EUHMAPLANT appeared to be operating properly. There were no fugitive visible emissions from the virgin aggregate conveyors, RAP conveyors or RAP collar, the drum dryer, the burner housing, the knockout box, baghouse, dust reinjection system, or drag slat conveyor.

6. The permittee is required to keep the following records for each calendar month of operation:

- a. Identification, type and amounts (in gallons) of all fuel oils combined. Page 2 of the monthly report *Ace A3 Burton 6-2020 Monthly Production and Emissions Log.pdf* is a Fuel Log. It shows that for the month of June, no RUO was burned. The facility is meeting the requirement.
- b. Sulfur content (percent by weight), specific gravity, flash point, and higher heating value (Btu/lb) of all fuel oils being combusted. No RUO was being burned at this time, as documented in the monthly report for June 2020. The facility has been following their RUO compliance plan during inspections, in the past, when RUO has been burned.
- c. Tons of HMA containing RAP produced, including the average % of RAP per ton of HMA produced containing RAP. This is being done, as demonstrated by page 1 of the monthly report for June 2020, which is an HMA Report.
- d. Tons of HMA produced while burning each fuel type. This is being done, as demonstrated by page 1 of the monthly report for June 2020, which is an HMA report.
- e. Tons of total HMA produced. This is being done, as demonstrated by page 1 of the monthly report for June 2020, which is an HMA report.
7. The permittee is required to keep intermittent daily records of the following production information for EUHMAPLANT:
- a. The virgin aggregate feed rate. This data is kept on a daily basis and is shown in their recordkeeping, please see attached *Ace A3 Burton - 6-8-2020 Daily Operator Log.pdf* and *Ace A3 Burton - 9-11-2020 Daily Operator Log.pdf*.
- b. The RAP feed rate. This data is kept on a daily basis and is shown in their recordkeeping, please see attached *Ace A3 Burton - 6-8-2020 Daily Operator Log.pdf* and *Ace A3 Burton - 9-11-2020 Daily Operator Log.pdf*. Average RAP content today, 6/8/2020, was 27.23%, within the permitted rate of 50%.
- c. The asphalt paving material product temperature. This data is kept on a daily basis and is shown in their recordkeeping, please see attached *Ace A3 Burton - 6-8-2020 Daily Operator Log.pdf* and *Ace A3 Burton - 9-11-2020 Daily Operator Log.pdf*. On today's date, 6/8/2020, the average daily mix temperature was 325 degrees F. The facility has met this requirement.
- d. Information sufficient to identify all components of the asphalt paving material mixture. This data is kept on a daily basis and is shown in their recordkeeping, please see attached *Ace A3 Burton - 6-8-2020 Daily Operator Log.pdf* and *Ace A3 Burton - 9-11-2020 Daily Operator Log.pdf*. On today's date, 6/8/2020, the liquid AC grade was Performance Grade (PG) 64-22, and all the aggregates, whether virgin or RAP, were identified by type and by how much was used for each mix. The facility has met this requirement.
- e. Tons of HMA produced while burning each fuel type. This data is kept in the daily operator logs, such as the attached *Ace A3 Burton - 6-8-2020 Daily Operator Log.pdf* and *Ace A3 Burton - 9-11-2020 Daily Operator Log.pdf*. They are meeting this requirement.
- f. Tons of total HMA produced. This data is kept in their daily reports, such as the attached *Ace A3 Burton - 6-8-2020 Daily Operator Log.pdf* and *Ace A3 Burton - 9-11-2020 Daily Operator Log.pdf*. It is also kept in reports which cover a longer period of time, such as the *Ace A3 Burton Consolidated Production Summary through 9-28-2020.pdf*. They are meeting this requirement.

The permittee is to record the initial mix design and time, upon startup. When a new mix design (i.e. a different mix design) is activated, the time and new mix design are to be recorded. It is my understanding that this data is kept.

8. This requires monthly and 12-month rolling time period emission calculation records of all criteria pollutants and TACs listed in the emission limit table at the start of the Special Conditions in the PTI for

EUHMAPLANT. Please note that stack test results may be used to estimate emissions, with AQD approval. 9. The permittee is to keep records of all CO emissions and related production data (at the time CO data was collected). It is my understanding that they are keeping production data from the time the CO emissions are monitored.

10. The permittee is to record average daily, monthly, and 12-month rolling time period records of the amount of HMA product produced while burning each fuel type, and of the total amount of HMA product produced. The facility appears to be keeping daily, monthly, and yearly records on fuel use, based on the daily and monthly and yearly recordkeeping provided by Ms. Ramsdell. The annual MAERS report also shows the amount of HMA product produced while burning each fuel type.

11. Monitoring is required of fuel usage rate for EUHMAPLANT, on a daily basis. It is my understanding that this data is kept on a daily basis.

VII. REPORTING

1. Within 30 days after installation, construction, reconstruction, relocation or modification, the permittee is to notify the AQD in writing, of completion of this activity. The company sent AQD a letter notifying us of the 5/3/2016 date of completion of construction.

VIII. STACK/VENT RESTRICTIONS

1. The exhaust gases from the baghouse exhaust stack are required to be exhausted unobstructed vertically upwards from a stack (SVHMAPLANT) with a maximum diameter of 68 inches, and a minimum height of 50 feet. The stack appears to comply with this requirement.

IX. OTHER REQUIREMENTS

NA.

Special Conditions applicable to EUYARD:

1. EMISSION LIMITS

NA

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The fugitive dust control plan in Appendix B of the PTI is required to be implemented and maintained. The facility appeared to be taking the necessary steps to control fugitive dust onsite. Sweeping and application of dust suppressants appeared to be done in a diligent manner, and house keeping was excellent, for things like spilled materials.

IV. DESIGN/EQUIPMENT PARAMETERS

NA

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

1. All required calculations are to be completed by the 30th day of the calendar month, for the previous calendar month.

2. The permittee is required to calculate the annual fugitive dust emissions for EUYARD,, using emission factors from the U.S. Environmental Protection Agency (EPA) document AP-42, or other emission factors approved by the DEQ. The company submitted in early 2020 the 2019 fugitive dust emission calculation in their MAERS report . The emissions are shown in the table of 2019 fugitive dust emissions, under SC No. VII. 1, below.

VII. REPORTING

1. The permittee is required to report the actual emission levels from EUYARD to the AQD through the annual MAERS report. The company submitted the 2019 annual fugitive dust emissions, via their MAERS report. Please see table below.

2019 fugitive dust emissions:

Process	Lbs	Tons
Haul roads – paved & unpaved	4,540.88	2.27
Aggregate storage	6,612.05	3.31

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

NA

Special Conditions applicable to EUACTANKS**I. EMISSION LIMITS**

NA

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

The permittee is required to install, maintain, and operate in a satisfactory manner a vapor condensation and recovery system. The three new liquid AC tanks and the two existing liquid AC tanks which remain from the previous plant at this site are all equipped with condensers. The three new tanks are vertical, while the two existing ones are horizontal. No visible emissions could be seen from the tanks, or their condensers.

IV. DESIGN/EQUIPMENT PARAMETERS

NA

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

NA

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

NA

Special Conditions applicable to EUSILOS

I. EMISSION LIMITS

NA

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee is required to have an emission control system from the top of each storage silo which is installed, maintained, and operated in a satisfactory manner. Emissions from the top of each silo are drawn downwards, through the enclosed drag slat conveyor, and ducted to the burning zone of the drum dryer for combustion. When the drum dryer is not running, silo emissions pass through the dryer, and exit the plant after traveling through the main baghouse and the 50 foot exhaust stack. No visible emissions could be seen from the top of the storage silos, or from the drag slat conveyor.

2. The permittee is required to have the load out activities take place in an area which is enclosed except for entrance and exit points, with emissions vented into the burning zone of the drum dryer or controlled by equivalent means. The company chose as an equivalent means a blue smoke control system. They are required to install, maintain, and operate the system in a satisfactory manner.

There are four storage silos for HMA product, and two loadout lanes which pass underneath them. The loadout lanes are not totally enclosed. Rather, the sides of the lanes are somewhat open, with wall panels which extend down from the ceiling of the loadout area, stopping at about the roofline of a typical truck. It is my understanding that the purpose of this design is to allow for a truck driver to safely exit their vehicle and the loadout lane itself, in the event of an accident.

An air handling system has been installed for the loadout lanes under the silos, with the intent to capture emissions of blue smoke from the loadout process. The captured emissions are then routed to a baghouse for control. It is my understanding that the baghouse contains dry plastic pellets, which are moved in a swirling motion, followed by a series of fabric bags. The controlled emissions are then exhausted unobstructed vertically upwards, through a single exhaust stack.

I observed the loadout process, standing to the east of the silos and loadout lanes. I did not note any fugitive emissions escaping from the loadout lanes. When truck loadout emissions were being routed to

the loadout baghouse, I saw no emissions from the baghouse exhaust stack. It appeared to be working properly.

IV. DESIGN/EQUIPMENT PARAMETERS

NA

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

NA

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

NA

Miscellaneous:

They do not have a boiler onsite, but rather a small, on demand hot water heater, so a copy of the DEQ boiler NESHAP card was not provided, in this instance. The heater is much smaller than 120 gallons in capacity, and does not appear to be subject to the boiler NESHAP for area sources, 40 CFR Part 63, Subpart JJJJJJ.

Conclusion:

No instances of noncompliance were observed. Housekeeping at the facility was done to a very high standard.

NAME *Daniel A. Maen*

DATE 9/28/2020

SUPERVISOR *B. M.*